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## REMARKS

Claims 1-19 are pending in this application. Claims 1 and 19 have been amended. New claim 20 has been added.

Claims 1-10, 12-19 were rejected under 35 USC §103(a) as being unpatentable over Foth (Application No. 2003/0068045) in view of McGarvey et al. (Application No. 2003/0028773). Claim 11 was rejected under 35 USC §103(a) as being unpatentable over Foth in view of McGarvey et al. and further in view of Taniguchi et al. (U.S. Patent No. 6,801,962).

Claim 1, as amended, claims in a client-server-document repository system, a secure method for remote action by reference, comprising: establishing a communication channel directly between the client and the server via one of a wireless link and a landline; sending, from the client to the server via the communication channel, user credentials pertaining to a document stored in a document repository and requesting an action be performed on the document, a delegation credential giving permission to the server to obtain the document from the document repository and permitting the server to perform the action on the document on the user's behalf and the address of the document in the document repository; verifying, at the server, the user's credentials and the delegation credential; if verified, sending, from the server to the document repository, server credentials, the delegation credential and the address of the document; verifying, at the document repository, the server's credentials and the delegation credential; if verified, sending the document from the document repository to the server; and performing the action on the document at the server.

New claim 20 claims in a client-server-document repository system, a secure method for remote action by reference, comprising: establishing a secure communication channel directly between the client and a document repository via one of a wireless link and a landline; sending, from the client to the document repository via the communication channel, user credentials pertaining to a document stored in the document repository, a delegation credential giving permission to a server to obtain the document from the document repository, requesting an action be performed on the document at a server and permitting the server to perform the action on the document on the user's behalf, the address of the server and the address of the document in the

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document repository; verifying at the document repository the user's credentials; if verified, sending from the document repository to the server, the document repository's credentials, the delegation credential and the document; and verifying, at the server, the document repository's credentials and the delegation credential; if verified, performing the action on the document at the server. Support for new claim 20 can be found on page 6, lines 16-22 of the specification.

Foth requires an adapter between the user and the printer. Foth teaches secure printing where the client 22 uses a secure device (adapter 30) to obtain a document from a document repository and the adapter sends the document securely to a server (printer). In Foth, the user first establishes communication with the adapter. See step 54 of Fig. 2A and paragraphs 21, 23 of Foth. In Foth, adapter 30 communicates with the data center 12 and obtains the document 14, which it sends to a printer 20 (either directly or through a personal computer 40). Printer 20 does not communicate directly with data center 12. Nor does client 22 communicate directly with printer 20. See paragraph 24 of Foth. "If the documents 14 are not to be encrypted, then in step 66 the data center 12 translates the print request to a network based printing protocol print request, such as, for example, an Internet Printing Protocol request, for the target printer 20 and sends the requested documents 14 to the printer 20 via the Internet 18 through adapter 30." (See paragraph 24 of Foth.) Adapter 30 provides any required security when obtaining documents directly from data center 12. If the document is encrypted, adapter 30 decrypts it prior to sending it to printer 20. "In step 74, the adapter 30 decrypts the documents 14 and sends the decrypted documents 14 to printer 20. (See paragraph 25 of Foth.)

Foth requires the imposition of an adapter between the client and the printer (and in other embodiments, between the printer and the document repository). The adapter is a hardware device which may be external or built into a printer. In contrast, Applicants' claims require no adapter to achieve secure printing. Applicants' Claim 1, claims, in part: "establishing a communication channel directly between the client and the server via one of a wireless link and a landline; sending, from the client to the server via the communication channel, user credentials pertaining to a document stored in a document repository and requesting an action be performed on the document, a

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delegation credential giving permission to the server to obtain the document from the document repository and permitting the server to perform the action on the document on the user's behalf and the address of the document in the document repository. In Applicants' method, the client communicates <u>directly</u> with the server via the communication channel. No additional hardware is required. The communication channel can be established via a wireless link or via a landline.

The Examiner asserts that "the adapter of Foth, which can be incorporated in the printer, does not communicate directly with the data center (document repository), but it goes through the Internet (Figure 1)." Foth's adapter is an additional layer or wall or gate through which communications between a user and a printer must occur In Foth, communications cannot be sent to the Internet without first passing through the adapter. "In accordance with the present invention [of Foth], <u>an adapter 30 is coupled between</u> printer 20 and the Internet 18." See paragraph 20 of Foth. An adapter is not required in Applicants' method. In Applicants' method a communication channel is established directly between the client and the server via one of a wireless link and a landline and the client communicates with the server via the communication channel. In Applicants' method the client can communicate with the printer via a wireless link, such as IrDA or Bluetooth or TCP/IP or via a landline (connected to an ISP and the Internet). No additional hardware, whether a standalone adapter or a printer with built-in, customized adapter, is required.

<u>Adding a delegation credential from McGarvey does not teach removing the adapter of Foth.</u> The Examiner asserts that the system of Foth would benefit from the use of a delegation credential in that "a request has to traverse multiple hops through the Internet which is insecure, so a secure propagation of credentials through the multiple hops using a delegation credential would enhance the system of Foth." However, adding delegation credentials to the system of Foth would still require the delegation credentials to pass through the adapter 30 of Foth. Nothing in McGarvey suggests removing the adapter 30 from Foth.
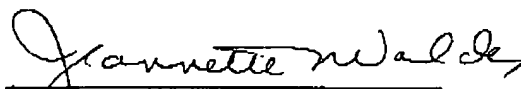
Applicants believe that Claims 1-20 are in condition for allowance.

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No additional fee is believed to be required for this amendment; however, the undersigned Xerox Corporation attorney hereby authorizes the charging of any necessary fees, other than the issue fee, to Xerox Corporation Deposit Account No. 24-0025.

Reconsideration of this application and allowance thereof are earnestly solicited. In the event the Examiner considers a personal contact advantageous to the disposition of this case, the Examiner is requested to call the undersigned Attorney for Applicants, Jeannette Walder.

Respectfully submitted,

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Xerox Corporation
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